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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN TOWNSLEY,

Plaintiff,

v.

CANON BUSINESS SOLUTIONS, INC., a
corporation; and
DOES 1 through 100, Inclusive,

Defendants.

CASE NO. 4:13-cv-03026-DMR

**STIPULATION FOR ORDER AND
~~PROPOSED~~ ORDER TO EXTEND
DISCOVERY DEADLINES**

Complaint Filed: April 4, 2013

Trial Date: December 8, 2014

Plaintiff JOHN TOWNSLEY and Defendant CANON SOLUTIONS AMERICA, INC.,
formerly known as CANON BUSINESS SOLUTIONS, INC., hereby stipulate by and through their
respective counsel, as follows:

1. Plaintiff requests, and Defendant has no objection to such request, to extend the non-
expert discovery deadline and the expert disclosure and discovery deadlines in this matter.

2. The current non-expert discovery deadline is June 30, 2014. The parties make this stipulation to allow an additional 30 days to complete written discovery and to informally resolve document discovery issues prior to completing the deposition of Plaintiff.

3. The current deadline for expert disclosures is July 14, 2014. The parties make this stipulation to allow a reasonable time to disclose and depose experts after Defendant's summary judgment motion is heard. Under the Court's case management Order, the motion will be heard no later than September 25, 2014.

4. Based on the foregoing stipulations of the parties, the parties respectfully request that the Court set July 31, 2014, as the non-expert discovery deadline; October 6, 2014, as the expert disclosure deadline; October 20, 2014, as the rebuttal expert disclosure deadline; and November 21, 2014, as the expert discovery cutoff date. The proposed new discovery deadlines will not require change to any other case management dates or deadlines.

IT IS SO STIPULATED.

DATED: June 12, 2014

JOHN F. PRENTICE & ASSOCIATES, P.C.

/S/

John F. Prentice, Esq.
Sheila A. Reid, Esq.
Attorney for Plaintiff
JOHN TOWNSLEY

DATED: June 12, 2014

DORSEY & WHITNEY LLP

/S/

David Murphy, Esq.
Attorneys for Defendant
CANON SOLUTIONS AMERICA, INC.
fka CANON BUSINESS SOLUTIONS, INC.

ORDER

Based on the above stipulation of the Parties, and good cause appearing, IT IS SO ORDERED.

Dated: June 16, 2014



THE HONORABLE DONNA M. RYU
U.S. District Court Magistrate Judge